

REMARKS

Claims 1-34 are pending. By this response, Claims 1, 11, 16, 21, 24 and 27 are amended.

Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

Claims 11, 21, 24 and 27

The Office Action rejects Claims 11-15, 21, 23-24, and 26 under 35 U.S.C. § 103(b) as being anticipated by Ilg et al. (U.S. Patent No. 4,829,297); Claims 22 and 25 under 35 U.S.C. § 103(a) as being unpatentable over Ilg in view of Callaway et al. (U.S. Patent No. 6,275,500) and Claims 27-34 under 35 U.S.C. § 103(a) as being unpatentable over Ilg in view of Gilbert et al. (U.S. Patent No. 5,297,144). These rejections are respectfully traversed.

Ilg teaches a system in which a master station will periodically poll a plurality of remote stations. The remote stations are assigned to one of two groups. The first group is a plurality of stations which relay urgent information to the master. The second group consists of a plurality of non-priority stations that handle non-urgent data to the master. The two groups are designated based on the type of data they send. (See column 2, lines 20-32.)

Applicants respectfully submit that Ilg fails to teach or suggest, *inter alia*, for each of a plurality of secondary stations is designated as one of an input type or output type secondary station, wherein the refresh request is a request to an output type secondary station to output data external to the system, the output type secondary station being designated to output data from the system, and the polling request is a request to an input type secondary station to send data to the primary station, the input type secondary station being designated to prepare an input data to the primary station, as recited in independent Claims 11, 21 and 24. Further, Ilg fails to teach or suggest a plurality of secondary stations where each of the plurality of secondary stations is designated as one of an input type or output type secondary station, as recited in Claim 27.

As recited in the independent Claims, each of the plurality of secondary stations is designated as an input type or an output type secondary station. Thus, each secondary station is uniquely identified and only performs the function for which it is designated.

The Office Action alleges that column 3, lines 35-48 and column 4, lines 26 - 32 of Ilg teach an output type and input type secondary station. This section of Ilg teaches the use of a programmable controller 40 (master) with numerous program execution modules (44 remote stations). Input/output modules 45 are used to allow the program execution modules 44 to execute programs for the controller 40. The input/output modules act as an intermediary between the master controller and the remote stations. The input/output modules form both input and output of data between a remote station and the master. They are not individually designated as an output or input type nor do they perform the claimed features of outputting data from the system and preparing the inputting data to the primary station. Thus, Applicants respectfully submit that Ilg fails to teach the above-identified features of Applicants' independent Claims 11, 21, 24 and 27.

Further, Callaway and Gilbert fail to make up for the deficiencies of Ilg. Callaway teaches a master device which is able to poll and communicate with various slave devices. The system in Callaway does not employ an output or input type secondary station. Furthermore, the slave devices are not designated as an input type or output type device.

Gilbert is provided to teach the use of a synchronization request from a primary station to a secondary station, as recited in Claim 27. Gilbert does not teach or suggest using secondary devices which are designated as an output type or input type secondary station.

Therefore, in view of the above, Applicants respectfully submit that Ilg alone, or in combination with Callaway or Gilbert fail to teach each and every feature of independent Claims 11, 21, 24 and 27. Accordingly, reconsideration and withdrawal of the rejections with respect to these claims and their dependent claims are respectfully requested.

Claims 1 and 16

The Office Action rejects Claims 1-4, 6-10, 16-17 and 20 under 35 U.S.C. § 103(a) as being unpatentable over Joshi et al. (U.S. Patent No. 6,006,017) in view of Callaway et al.; Claims 3-4 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Joshi, Callaway, and Ilg et al.; and Claims 5 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Joshi, Callaway, and Davis et al. (U.S. Patent No. 4,363,039). These rejections are respectfully traversed.

Joshi teaches a system in which a primary station 10 is configured to transmit data to one or more secondary stations. Secondary stations are identified as secondary stations (active) or unresponsive secondary stations. See column 6, lines 27-40. The primary station can control the actions of the secondary station, so as to have access to an upstream channel 20 (see column 7, lines 43-48).

Nowhere in Joshi does it teach or suggest a plurality of secondary stations as either an input secondary station or an output secondary station, as recited in independent Claims 1 and 16. Joshi's system merely teaches the use of secondary stations that are either active or unresponsive.

Therefore, Joshi fails to teach or suggest, *inter alia*, where each of the plurality of secondary stations is designated as one of an input type or output type secondary station, as recited in independent Claims 1 and 16.

Further, Callaway and Davis fail to make up for the deficiencies of Joshi. Callaway, as discussed with regard to the independent Claims 11, 21, 24 and 27 teaches a conventional master slave device arrangement. Callaway does not teach or suggest using a plurality of secondary stations in which secondary stations are designated as either an input or output type secondary station. Also, Davis is applied to teach elements of the dependent claims. Davis does not teach or suggest the above-noted features of Applicants independent Claims 1 and 16 absent in Joshi and Callaway.

Finally, Ilg does not teach or suggest the above-noted Claim elements for the reasons discussed above and with regard to independent Claims 11, 21, 24 and 27.

Therefore, in view of the above, Applicants respectfully submit that the combination of Joshi, Callaway, Ilg, and/or Davis fail to teach each and every feature of independent Claims 1 and 16 as required. Accordingly, reconsideration and withdrawal of the rejections with regard to independent Claims 1 and 16 and their dependent claims are respectfully requested.

CONCLUSION

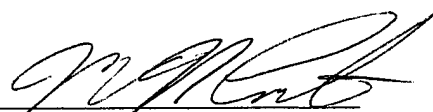
For at least these reasons, it is respectfully submitted that Claims 1-34 are distinguishable over the cited art. Favorable consideration and prompt allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad J. Billings (Reg. No. 48,917) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Dated: February 14, 2006

Respectfully submitted,

By 

Michael R. Cammarata
Registration No.: 39,491
BIRCH, STEWART, KOLASCH & BIRCH, LLP
8110 Gatehouse Road
Suite 100 East
P.O. Box 747
Falls Church, Virginia 22040-0747
(703) 205-8000
Attorney for Applicant